

American Automobile Manufacturers Association



June 16, 1998

Mr. Carlton T. Nash
Chief, Regulation Development Section
Regulation Development Section (AR-18J)
Air Programs Branch, Air and Radiation Division
United States Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

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JUN 17 1998

REGULATION DEVELOPMENT BRANCH
U.S. EPA, REGION 5

Subject: American Automobile Manufacturers Association Support for the Direct Final Rule Making Michigan's SIP Consistent with the Requirements of the Clean Air Act (63 Fed. Reg. 27492, May 19, 1998)

Dear Mr. Nash:

The American Automobile Manufacturers Association ("AAMA") is the trade association whose members are Chrysler Corporation, Ford Motor Company and General Motors Corporation. AAMA's members own and operate 130 automotive assembly and parts manufacturing facilities in Michigan, many of which are subject to Clean Air Act Title V permitting requirements.

AAMA supports the U.S. Environmental Protection Agency's direct final rule making Michigan's State Implementation Plan consistent with the requirements of the Clean Air Act (63 Fed. Reg. 27492, May 19, 1998). Michigan Rule 901 has never been viewed as a component of Michigan's control strategy for the attainment and maintenance of the National Ambient Air Quality Standards for criteria pollutants. It should, therefore, not be considered part of the Michigan State Implementation Plan.

AAMA assisted the Michigan Manufacturers Association ("MMA") in preparing a detailed review and analysis of the history, purpose, and use of Rule 901. We understand that this analysis is being provided to you in the comments submitted by the MMA and request that the MMA analysis be made part of the record for this rulemaking.

Sincerely

Amarjit Sidhu
Manager, Air Emissions and Control
American Automobile Manufacturers Association

HEADQUARTERS

1401 H Street, N.W. Suite 900, Washington, D.C. 20005
202•326•5500 FAX 202•326•5567

DETROIT OFFICE

7430 Second Avenue, Suite 300, Detroit, MI 48202
313•872•4311 FAX 313•872•5400